IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA | : | CRIMINAL NO. |
|--------------------------|---|--|
| v. | : | DATE FILED: |
| MOHIT VOHRA | : | VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribu- |

21 U.S.C. § 846 (conspiracy to distribute 5 kilograms or more of cocaine - 1 count) 21 U.S.C. § 841(a)(1) (possession with intent to distribute 100 kilograms or more

of marijuana - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least on or about March 11, 2009, through on or about March 24,
 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

MOHIT VOHRA

conspired and agreed, with others known and unknown to the grand jury, to knowingly and intentionally distribute 5 kilograms or more, that is, approximately 91.9 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

 The defendant was a member of a cocaine distribution organization that distributed cocaine by driving it from Los Angeles, California, to Philadelphia, Pennsylvania.
 All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

MOHIT VOHRA

knowingly and intentionally possessed with intent to distribute 100 kilograms or more, that is, approximately 609 kilograms, of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

| FOREPERSON | A TRUE BILL: |
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| TOTALLERSON | FOREPERSON |

MICHAEL L. LEVY United States Attorney